

UNITED STATES DISTRICT COURT

for the

Western District of Missouri

United States of America
v.

JAY PAUL ROBINSON

Defendant(s)

Case No.

19-3002-MJ-WJE

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 5, 2018, in the county of Boone in the
Western District of Missouri, the defendant(s) violated:*Code Section*18 U.S.C. § 1073
NMT 5 Years Imprisonment
NMT \$250,000 Fine
NMT 3 Years Supervised Release
Class D Felony*Offense Description*

On or about August 5, 2018, within Boone County, in the Western District of Missouri, and elsewhere, the defendant, JAY PAUL ROBINSON, moved or traveled in interstate and foreign commerce with the intent to avoid prosecution for multiple counts of invasion of privacy, forcible rape and sodomy, all of which are felonies under the laws of the State of Missouri; all in violation of Title 18, United States Code, Section 1073.

This criminal complaint is based on these facts:

See the affidavit of FBI SA S. Cody Abram, attached hereto and made a part hereof for all purposes.

☒ Continued on the attached sheet.*Complainant's signature*

SA S. Cody Abram, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 01/03/2019*Judge's signature*City and state: Jefferson City, Missouri

Willie J. Epps, Jr., United States Magistrate Judge

Printed name and title

**AFFIDAVIT
OF
S. CODY ABRAM
FEDERAL BUREAU OF INVESTIGATION**

I, S. Cody Abram, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), currently assigned to the Kansas City Division, Jefferson City Resident Agency in Jefferson City, Missouri. As such, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

2. I have been a Special Agent with the FBI since June 1998, and was previously employed as a Police Officer. I have over 23 years of law enforcement experience, and have had the opportunity to conduct, coordinate and/or participate in numerous federal investigations relating to violations of federal violent crime.

3. The statements contained in this affidavit are based on my personal knowledge as well as on information provided to me by other law enforcement officers. This affidavit is being submitted for the purpose of securing a federal arrest warrant, and I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe evidence of a violation of Title 18, United States Code, Section 1703, has been committed.

4. On August 2, 2018, an unidentified patron gave an employee of the Daniel Boone Regional Library, 100 West Broadway, Columbia, Boone County, Missouri, a small, discreet digital camera that the patron had discovered hidden in the library's public, unisex bathroom. Columbia Police Officer J.C. Jackson retrieved the camera and was able to produce still photographs of the person responsible for placing the camera in the restroom. Officer Jackson then distributed the photographs to Sgt. Chad Gooch, who was working at the library.

5. Also on August 2, 2018, Sgt. Gooch recognized an individual matching the description in the parking lot of the library, approached the man identified as JAY PAUL ROBINSON, and placed him under arrest for invasion of privacy. ROBINSON was transported to the Columbia Police Department where, prior to questioning, he was read his *Miranda* rights. ROBINSON invoked his rights and requested to have an attorney present during any questioning. Later that day, ROBINSON was released from custody.

6. Library staff pulled surveillance footage from their surveillance cameras, which revealed ROBINSON coming into the library on several occasions, walking directly to the bathroom where the camera was discovered, and immediately leaving just after a few minutes.

7. Subsequent to ROBINSON's arrest, the Columbia Police Department obtained search warrants to search Robinson's residence(s), cellular telephone and any computer media. A computer hard drive and other evidence was recovered from the search warrants. A computer analysis was conducted of the computer evidence located during the execution of the search warrants, which revealed several disturbing images of sexual assault, forcible rape, sodomy and invasion of privacy by ROBINSON, including but not limited to, the repeated and forcible rape of his ex-wife after he had drugged her. There were additional images located on the hard drive, which depicted hidden camera footage taken inside Robinson's residence and the library. Men, women and children were captured on the video from the digital camera that had been hidden in the library's public, unisex bathroom.

8. ROBINSON's ex-wife provided Columbia Police detectives with an email chain where ROBINSON told her the following in an email she received from ROBINSON on 08/04/2018):

I didn't have a phone. I fear you have no idea how bad this is going to get. I am meeting with an attorney Monday morning. I am pretty certain I am going to be going away for a quite long time. There is no way to undo the hurt and disgustingness I have done. At least this will keep me from causing more damage. I took half the money out of the old Rangeline account and half the High Point account to pay a retainer. Please tell our kids I love them. Because I really do.

9. ROBINSON's ex-wife stated that, in May 2018, ROBINSON received an equity check for \$30,000, and that he had withdrawn \$7,000 from a shared business account after his arrest. ROBINSON possesses a United States passport, and has not been seen since his arrest. It should be noted that ROBINSON had commented in the past how he would like to disappear at a moments' notice and start a new life. ROBINSON's ex-wife believes there is a possibility that ROBINSON has left the country and is working as a "handy-man."

10. Columbia Police detectives contacted Homeland Security Investigation (HSI) Special Agent Christopher A. Hessenflow, who advised that ROBINSON booked WOW Air flight #156 from Chicago, Illinois (ORD) to Reykjavik, Iceland (KEF) on August 5, 2018, at 11:40 p.m.


11. On October 19, 2018, a Boone County, Missouri, Circuit Court Judge issued an arrest warrant for ROBINSON in case number 18BA-CR037777 for a single count of felony invasion of privacy. Included in the bond conditions was the statement that the "Indictment [was] ordered filed and warrant issued and sealed. No Bond set."

12. Also on October 19, 2018, a Boone County, Missouri, Circuit Court Judge issued an arrest warrant for ROBINSON in case number 18BA-CR037781 for a single felony count of forcible rape – sexual intercourse by compulsion, eight felony counts of forcible sodomy – deviate sexual intercourse by forcible compulsion, three felony counts of sodomy or attempted sodomy in the first degree, nine felony counts of invasion of privacy in the first degree, and three felony

counts of invasion of privacy. Included in the bond conditions was the statement that the “Indictment [was] ordered filed and warrant issued and sealed. No Bond set.”

13. In view of the foregoing, there is probable cause to conclude that ROBINSON has moved or traveled in interstate and foreign commerce with the intent to avoid prosecution for multiple counts of invasion of privacy, forcible rape and sodomy, all of which are felonies under the laws of the State of Missouri; all violation of Title 18, United States Code, Section 1703.

14. The facts set forth in this affidavit are true and correct to the best of my knowledge and belief.



S. Cody Abram
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me, on this, the 3rd day of January, 2019.



Willie J. Epps, Jr.
United States Magistrate Judge